

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VELERON HOLDING, B.V.,

Plaintiff,

- against -

MORGAN STANLEY; MORGAN STANLEY CAPITAL SERVICES, INC.; MORGAN STANLEY & CO., INCORPORATED; and MORGAN STANLEY & CO.,

Defendants.

Index No.: 12-cv-5966 (CM)

DECLARATION OF EMILIE B. COOPER IN SUPPORT OF PLAINTIFF VELERON HOLDING, B.V.'S MOTION TO QUASH THE TRIAL SUBPOENAS OF OLEG DERIPASKA, GULZHAN MOLDAZHANOVA, AND BAUKE VAN DER MEER

I, **EMILIE B. COOPER**, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, the following:

1. I am an attorney admitted to practice before this Court and a member of the firm Kasowitz, Benson, Torres & Friedman LLP, attorneys for plaintiff Veleron Holding, B.V. (“Veleron”) in the above-captioned action. I respectfully submit this declaration in support of Veleron’s motion to quash the trial subpoenas of Oleg Deripaska, Gulzhan Moldazhanova, and Bauke van der Meer.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Joint Pre-Trial Order, submitted by the parties to the Court on September 30, 2014.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition transcript of Andrey Yashchenko, dated July 17, 2014.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the deposition transcript of Oleg Deripaska, dated July 16, 2014.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the deposition transcript of Gulzhan Moldazhanova, dated July 15, 2014.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of Bauke van der Meer, dated July 17, 2014.

Dated: New York, New York
October 12, 2015


Emilie B. Cooper